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February 18, 2000

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Ex Parte Statement  
CC Docket 98-147

Dear Ms. Salas:

On Thursday, February 17, 2000, Ross Ireland, Senior Vice President, Network Planning and Engineering, Gary Fleming, Executive Director, Network Planning and Engineering, Matthew Adams, Jan Moody, Liz Gedes and I met with Bill Kehoe and Jon Reel, Policy and Program Planning Division and Mark Stone, Accounting Safeguards Division.

The purpose of the meeting was to discuss the issues set forth in the attachment hereto.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Smith", is written over the word "Sincerely,".

Jim Smith  
Director - Federal Regulatory

Attachment

cc: B. Kehoe  
J. Reel  
M. Stone

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### Conversion of Virtual Collocation to Physical Collocation

- CLECs have the ability to convert existing virtual collocation by establishing physical collocation, rolling existing circuits to the physical arrangement and then discontinuing virtual collocation.
- In place conversion is not appropriate, it circumvents and negates space reservation planning

## Wire Center Planning – Space Reservation

### Technical Feasibility

- Switch, MDF, power and DCS equipment have specific technical design constraints.
- Design criteria for switch, DCS and similar equipment is a single contiguous source of power.
- Power space has unique floor and environmental requirements.
- The capacity of a distributing frame is reduced if the frame is not contiguous.
- Space reservation interval for common equipment is current year + 10, for transport equipment is current year + 2.

## Operational Feasibility

- Operational management of a non-contiguous distributing frame more than doubles the labor for many connections.
- The time required for building relief is consistent with current year + 2 intervals
- Transport demand is more volatile – significantly impacted by CLEC interconnection and transport needs.

### Wire Center Planning – Space Assignment

- SBC allocates space for collocation in the following order:
  - First Choice: Active space is the first choice for all physical collocation requests.
  - Second Choice: InActive CO space, or space requiring conditioning for HVAC, power, etc...
  - Third Choice: Power equipment areas
- Collocators should provide forecasts of their needs
  - Logical equipment placement and growth plan is necessary to ensure optimal use of space

## Collocation Delivery Intervals

### **COVAD Position**

- FCC set interval, adopt best practice of 45 day interval, cheapest and most readily available space

### **SWBT Position:**

- States are in best position to set collocation intervals.
- SBC State intervals are competitive with any standard offerings in US.
- Texas intervals aren't best practices, due to inefficiencies associated with non-standard practices.
- COVAD's proposed interval is not reasonable in light of industry experience.
- Best practice: Establish collocation intervals that can be met for all requests; meter based on the volume of activity.
- Provisions exist for CLECs to do advanced joint planning to respond to their collocation requests.

### Central Office Security

- Network reliability is of paramount importance; where security is concerned prevention is the key
- CLECs have options available to protect their equipment (caged collocation, shared cage, cabinetized equipment)
- The FCC has given SBC same right to take reasonable security precautions to protect its equipment:
- Costs to Collocator's are least cost avenues
- Security partitions do not block space that would otherwise be used for collocation